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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

ROBERT WRIGHT, on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

CHARLES SCHWAB & CO., INC.,

Defendant.

Case No. 3:20-cv-05281

**DECLARATION OF SANDER  
TEXEL IN SUPPORT OF  
DEFENDANT CHARLES SCHWAB  
& CO., INC.'S NOTICE OF  
REMOVAL**

[Removed from San Francisco Superior Court  
Case No. CGC-20-585092]

1 I, Sander Texel, declare as follows:

2 1. I am employed by Charles Schwab & Co., Inc. ("Schwab") as a Senior Team Manager. I  
3 have been employed in various positions by Schwab for six years. I make this declaration in  
4 support of Schwab's Notice of Removal. I have personal knowledge of the following facts and, if  
5 called as a witness, I could and would testify to them under oath.

6 2. Schwab is a registered broker-dealer with the U.S. Security and Exchange Commission in  
7 all fifty states and is a member of the Financial Industry Regulatory Authority, Inc. (FINRA).  
8 Schwab offers investment products and services, including online brokerage accounts, to retail  
9 customers throughout the United States.

10 3. In order to register for an account, Schwab customers must provide certain basic  
11 information, including the state in which they reside. Schwab maintains this information in the  
12 normal course of its business.

13 4. I have reviewed Schwab's internal records regarding the residences of its retail brokerage  
14 account holders. Based on that review, I understand that for customers who reside in the United  
15 States as of June 30, 2020, approximately 23% of Schwab retail brokerage clients were located in  
16 California. The remaining 77% of Schwab clients reside in other states and/or territories.

17  
18 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
19 and correct. Executed on July 31, 2020, in San Francisco, California.

20  
21 

22 \_\_\_\_\_  
Sander Texel